



SEALED

**Office of the United States Attorney
District of Nevada
501 Las Vegas Boulevard South,
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FILED.

DATED: 1:49 pm, August 10, 2020

U.S. MAGISTRATE JUDGE

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

Case No. 2:20-mj-664-BNW

4 Plaintiff,

5 v.

6 KAREN CHAPON,
7 aka "Karen Hannafious,"

8 Defendant.

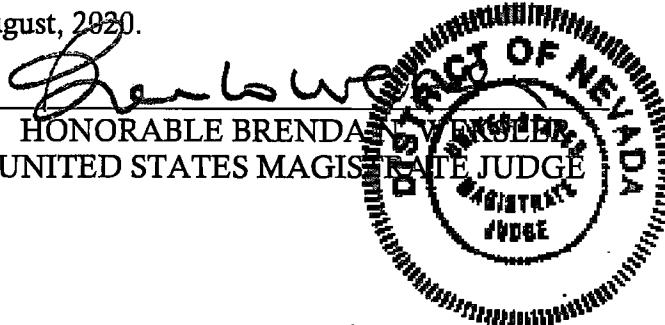
9 **[Proposed] Order Granting Government's Motion to Seal Complaint**

10 **(Filed Under Seal)**

11 Based on the pending Motion of the Government, and good cause appearing, IT IS
12 HEREBY ORDERED that the Complaint, the Motion, and this Court's Sealing Order in
13 the above-captioned matter shall be sealed until further Order of the Court.

14 DATED this 10th day of August, 2020.

15 HONORABLE BRENDAN WENGER
16 UNITED STATES MAGISTRATE JUDGE



1 NICHOLAS A. TRUTANICH
2 United States Attorney
3 Nevada Bar Number 13644
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U.S. MAGISTRATE JUDGE

6 *Attorneys for the United States*

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

Case No. 2:20-mj-664-BNW

10 Plaintiff,

**Government's Motion to Seal
Complaint**

11 v.

(Filed Under Seal)

12 KAREN CHAPON,
aka "Karen Hannafious,"

13 Defendant.

14
15 The United States of America, by and through Nicholas A. Trutanich, United States
16 Attorney, and Jessica Oliva, Assistant United States Attorney, respectfully moves this
17 Honorable Court for an Order sealing the Complaint, together with this Motion and the
18 Court's Sealing Order, in the above-captioned matter until such time as the Court, or
19 another Court of competent jurisdiction, shall order otherwise.

20 It is necessary for the Complaint in this case to be sealed in light of the fact that it
21 makes reference to information regarding an ongoing investigation. Public disclosure of the
22 information in the Complaint might jeopardize the investigation because Defendant Karen
23 Chapon is not yet in custody. Chapon is charged with engaging in a scheme to defraud
24 financial institutions by submitting false documentation and information in applications for

1 federal Paycheck Protection Program loans. In making these applications, Chapon claimed
2 to be operating companies which had been generating substantial revenues and incurring
3 significant expenses before the COVID-19 pandemic. In reality, these companies do not
4 appear to have been operational at all. Should Chapon learn of this investigation before she
5 is arrested, Chapon could fabricate, alter or destroy evidence of these crimes.

6 To facilitate Chapon's arrest, the Government respectfully requests that this Court
7 grant the Government's motion and seal the Complaint in this case, as well as this Motion
8 and the Court's Order on this Motion.

9 DATED this 10th day of August, 2020.

10 Respectfully submitted,
11 NICHOLAS A. TRUTANICH
United States Attorney

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13 JESSICA OLIVA
Assistant United States Attorney

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